

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS**

**CIVIL ACTION NO.: 04-30172-MAP**

**ROBERT DADE,**  
**Plaintiff**

**v.**

**BOLAND BUILDERS, INC., THOMAS**  
**M. BOLAND, STUART JONES AND**  
**MARY ROSE JONES,**  
**Defendants**

)  
)  
)  
)  
) **PLAINTIFF'S SUPPLEMENTAL**  
) **ANSWERS TO INTERROGATORIES**  
) **PROPOUNDED BY DEFENDANT**  
) **STUART (STEWART) JONES**  
)  
)  
)

5. If you claim your accident was due to a defect in the defendant's premises, please describe in full detail said defect, and state:

(c) Whether you observed said defect prior to your alleged accident.

ANSWER:

I was hired as a subcontractor to Seamless Metals, which had been subcontracted by Boland to roof the building. See also original answer #10.

7. If there were any persons with or near you at the time of your accident, please state their names and addresses, and their relationship to the defendant.

ANSWER:

Mike Voli is Michael Volonino, 121 Birch Street, Bristol CT.

9. If you claim personal injury as a result of your accident, please give:

(h) the name and address of your employer or the name and address of the school you were attending at the time of your alleged accident.

ANSWER:

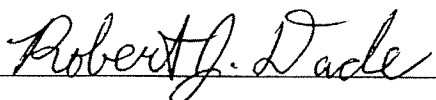
I was a subcontractor to Seamless Metals. See also original answer to #10.

13. Please state whether at the time of your alleged injury you were performing work on the premises of the defendants Stuart Jones and Mary Rose Jones as an employee of or on behalf of defendant Thomas M. Boland or Boland Builders, Inc.


ANSWER:

I was hired as a subcontractor to Seamless Metals which had been subcontracted by Boland to roof the building. See also original answer #10.

Signed under the pains and penalties of perjury this 26 day of January, 2006.

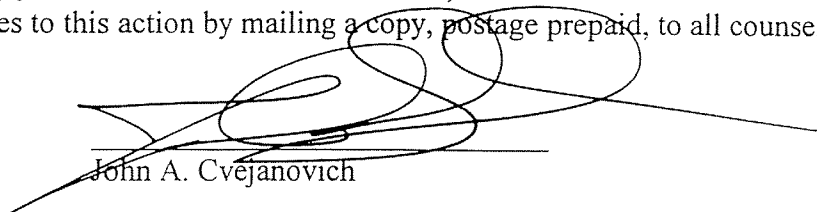
  
ROBERT DADE

AS TO OBJECTIONS:

  
John A. Cvejánovich, BBO #549285  
O'CONNELL, FLAHERTY & ATTMORE, LLC  
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CERTIFICATE OF SERVICE AND COMPLIANCE

I certify that on 2/6/06 I served the within document, within the time standards provided therefor, on the parties to this action by mailing a copy, postage prepaid, to all counsel of record.

  
John A. Cvejánovich